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January 16, 2025

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VIA ECF

Hon. Ronnie Abrams
United States District Court
40 Foley Square
New York, NY 10007

Re: *Carter v. Keurig Dr Pepper Inc.*, 1:25-cv-00037 (S.D.N.Y)

Dear Judge Abrams:

We write on behalf of Defendant Keurig Dr Pepper Inc. ("KDP"), on consent of Plaintiff Cri'Shawna Carter ("Plaintiff"), and pursuant to Your Honor's Individual Practice Rule 1(D) and Local Civil Rule 7.1(e), to request a 30-day extension of time to respond to the Complaint (Dkt. No. 1), through and including March 3, 2025. For efficiency, KDP further requests that this Court continue the February 7, 2025 initial status conference, and related deadlines, until after a ruling on KDP's anticipated motion to dismiss.

KDP's original deadline to respond to the Complaint is January 31, 2025. Plaintiff filed the Complaint on October 26, 2024 in the Supreme Court of the State of New York, County of Bronx. Plaintiff e-mailed KDP the Complaint on December 3, 2024, along with a stipulation stating that service would be complete on December 26, 2024 and Defendant would have until January 31, 2025 to respond. The stipulation further clarified that the January 31 deadline would be effective upon removal. KDP subsequently removed the case to this Court.

An extension would be particularly assistive to ensure compliance with the local rules and Your Honor's Individual Practice. The requested extension will also allow KDP time to further investigate the matter and adequately prepare its defense. This is the first extension request by either party. For efficiency's sake, KDP further requests the February 7, 2025 initial status conference, and related deadlines, be continued until after a ruling on KDP's anticipated motion to dismiss.

Respectfully Submitted,

/s/ Gabriella Marie Romanos Abi Habib

Gabriella Marie Romanos Abi Habib

cc: All counsel of record via ECF

Application granted in part. Defendant shall have until March 3, 2025 to respond to the complaint. By January 23, 2025, Plaintiff shall advise the Court whether she objects to the request to adjourn the initial conference pending the Court's resolution of the forthcoming motion to dismiss.

SO ORDERED.

A handwritten signature in blue ink, appearing to be "Ronnie Abrams", written over a horizontal line.

Hon. Ronnie Abrams
January 17, 2025